UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NORTH CAROLINA

IN RE MISSION HEALTH ANTITRUST LITIGATION

No.: 1:22-cv-00114-MR

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Local Civil Rule 7.1, Plaintiffs and Defendants (together, the "Parties") jointly move for the entry of a Protective Order, in the form attached hereto as Exhibit 1, in the above-captioned action. Good cause exists for the entry of the proposed Protective Order, including because discovery in this action is likely to involve confidential, proprietary, personal, and/or private information.

Respectfully submitted, this is the 11th day of June, 2024.

/s/ Robert N. Hunter, Jr.

Robert N. Hunter, Jr.
Fred Berry
John F. Bloss
HIGGINS BENJAMIN, PLLC
301 North Elm Street, Suite 800
Greensboro, NC 27401
Phone: (336) 273-1600
Facsimile: (336) 274-4650
rnhunter@greensborolaw.com
fberry@greesnborolaw.com
jbloss@greensborolaw.com

Eric L. Cramer*
Jacob M. Polakoff*
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Phone: (215) 875-3000
ecramer@bm.net
jpolakoff@bm.net

Brendan P. Glackin*
Dean M. Harvey*
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, Suite 2900
San Francisco, CA 94111
Phone: (415) 956-1000
bglackin@lchb.com
dharvey@lchb.com

Robert E. Litan*
Daniel J. Walker*
BERGER MONTAGUE PC
1001 G Street, NW
Suite 400 East
Washington DC, 20001
Phone: (202) 559-9745
rlitan@bm.net
dwalker@bm.net

Daniel E. Seltz*
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Phone: (212) 355-9500
dseltz@lchb.com

Counsel for Plaintiffs and the Proposed Class *Admitted pro hac vice

/s/ Abram Ellis

Abram Ellis (admitted pro hac vice)
Sara Razi (admitted pro hac vice)
SIMPSON THACHER & BARTLETT LLP
900 G Street NW, Ste. 900
Washington DC, 20001
Phone: (202) 636-5500
aellis@stblaw.com
sara.razi@stblaw.com

Phillip T. Jackson (N.C. Bar No. 21134)
John Noor (N.C. Bar No. 43102)
David Hawisher (N.C. Bar No. 55502)
ROBERTS & STEVENS, PA
P.O. Box 7647
Asheville, NC 28802
Phone: (828) 252-6600
pjackson@roberts-stevens.com
jnoor@roberts-stevens.com
dhawisher@roberts-stevens.com

Counsel for Defendants HCA Healthcare, Inc., HCA Management Services, LP, HCA, Inc., MH Master Holdings, LLP, MH Hospital Manager, LLC, and MH Mission Hospital, LLLP.

/s/Dana C. Lumsden

Dana C. Lumsden (N.C. Bar No. 32497) Anna-Bryce Hobson (N.C. Bar No. 54260) Hanna E. Eickmeier (N.C. Bar No. 54927) BRADLEY ARANT BOULT CUMMINGS LLP 214 North Tryon Street, Suite 3700

Charlotte, NC 28202 Telephone: 704-338-6034 Facsimile: 704-332-8858 dlumsden@bradley.com ahobson@bradley.com heickmeier@bradley.com

Kenneth M. Vorrasi (admitted pro hac vice) Jonathan H. Todt (N.C. Bar No. 52952) Alison M. Agnew (admitted pro hac vice) FAEGRE DRINKER BIDDLE & REATH LLP 1500 K Street, NW Suite 1100 Washington, D.C. 20005

Telephone: 202-842-8800 Facsimile: 202-842-8465

kenneth.vorrasi@faegredrinker.com jonathan.todt@faegredrinker.com alison.agnew@faegredrinker.com

Paul H. Saint-Antoine (admitted pro hac vice) FAEGRE DRINKER BIDDLE & REATH LLP One Logan Square, Ste. 2000 Philadelphia, PA 19103 Telephone: 215-988-2700 Facsimile: 215-988-2757

paul.saint-antoine@faegredrinker.com

Counsel for Defendants ANC Healthcare, Inc. f/k/a Mission Health System, Inc., and Mission Hospital, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on all counsel of record in the above-captioned action via CM/ECF filing.

Dated: June 11, 2024

/s/ Jacob M. Polakoff Jacob M. Polakoff